



Northeast
Utilities System

107 Seiden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(860) 665-5000

Mr. John Muleta

Chief of the Wireless Telecommunications Bureau

Federal Communications Commission

445 Twelfth St, SW

Washington DC, 20554

Subject: Improving Public Safety Communications in the 800 MHz Band (WT Docket No. 02-55) / 900 MHz Spectrum Reallocation (DA 04-3013)

Dear Mr. Muleta,

We at Northeast Utilities filed a number of 896 - 901 MHz / 935 - 940 MHz applications just before the 900 MHz filing freeze. We are implementing a new 900 MHz mobile radio network as a last resort because we cannot remain on the low-band VHF spectrum, mainly for worker safety reasons. There are too many noise problems with our 30 - 50 MHz system to consider replacing the system - the bulk of which has been in service for over twenty years - with another low-band VHF system. It is also important to us to consider future uses for the new mobile radio network, including but not limited to: data to the vehicles for automating the dispatching of crews, providing technical data needed in the field, and automating the electric distribution system to reduce outage times and improve safety of the public and first responders to the scene of a downed wire.

The applications that we filed are not nearly complete with respect to the possible future needs for this system . Although we should be able to reuse the same spectrum within our coordinated areas of operation across Connecticut and Western Massachusetts, we also have territory in New Hampshire which was not included in our original filings. Our budget constraints won't allow us to build the whole system at once. If we needed to purchase spectrum at Auction on top of the huge expense we are already faced with to provide adequate coverage at these frequencies, it would take many years for us to be able to provide these urgently needed services. Our customers would lose as well, because the money spent would be recovered in our rates to them .

Considering the lack of available licensable spectrum in the VHF and UHF bands, please understand that auctioning what remains of the 900 MHz Private Land Mobile Spectrum would not be in the best interest of critical infrastructure groups such as utilities, or consequently, of the public.

Respectfully,

Dorothy C. Wrona

IT - Telecommunications Engineer

Northeast Utilities Service Company